

1 DONALD H. MEDEARIS, SBN 206849
2 BAY AREA LEGAL AID
3 1800 Market Street, 3rd Floor
4 San Francisco, CA 94102
5 Telephone: (415) 354-6331
6 Fax: (415) 982-4243
dmedearis@baylegal.org

7
8 Attorney for Plaintiff,
9 SYED ABU TAHIR

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SYED ABU TAHIR,) Case No. 4:18-cv-03675-HSG
vs. Plaintiff,)
NANCY A. BERRYHILL, Acting) **STIPULATION AND PROPOSED ORDER**
Commissioner of the Social Security) **FOR A SECOND EXTENSION OF TIME**
Administration,) **FOR PLAINTIFF TO FILE MOTION FOR**
Defendant.) **SUMMARY JUDGMENT**

IT IS HEREBY STIPULATED, by and between the parties, through their respective
counsel of record, that Plaintiff shall have a second extension of time of 28 days to file his
Motion for Summary Judgment (MSJ) in response to Defendant's Answer. The Court
previously granted Plaintiff's request for an extension of 60 days to file his MSJ, so that
Plaintiff, who was then Pro Se, would have time to seek counsel. Plaintiff has now obtained
counsel and counsel substituted in as Plaintiff's attorney today. Plaintiff's attorney requests
an extension because he will be representing clients at two already-scheduled Social Security

STIPULATION TO A SECOND EXTENSION OF TIME FOR PLAINTIFF TO FILE
MOTION FOR SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 4:18-
CV-03675-HSG

1 administrative hearings this Thursday, May 9, a Reply brief due in another United States
2 District Court case on May 10, 2019, and a heavy caseload.

3 The current due date for Plaintiff's Motion for Summary Judgment is Monday, May
4 13, 2019. The new due date for filing Plaintiff's Motion for Summary Judgment would be
5 Monday, June 10, 2019. The Commissioner's Motion would then be due on or before
6 Monday, July 8, 2019.
7

8 Plaintiff and Plaintiff's attorney sincerely apologize to the Court and to the Defendant
9 for any inconvenience caused by this delay. The parties further stipulate that the Court's
10 Scheduling Order shall be modified accordingly.
11

Respectfully submitted,

13 Dated: 05/06/2019

/s/ Donald H. Medearis
DONALD H. MEDEARIS
Attorney for Plaintiff

16 Dated: 05/06/2019

DAVID L. ANDERSON
United States Attorney
DEBORAH STACHEL,
Regional Chief Counsel Region IX

19 By: */s/ Sharon Lahey*
(*as authorized by e-mail on 05/06/2019)
SHARON LAHEY,
Assistant Regional Counsel
Attorneys for Defendant

22 ORDER:

24 APPROVED AND SO ORDERED

25 Dated: 5/7/2019

By: *Haywood S. Gill Jr.*
THE HONORABLE HAYWOOD S.
GILLIAM, JR.
United States District Judge

28 STIPULATION TO A SECOND EXTENSION OF TIME FOR PLAINTIFF TO FILE
MOTION FOR SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 4:18-
CV-03675-HSG